

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

EPIC GAMES, INC.,

Plaintiff, Counter-  
defendant

v.

APPLE INC.,

Defendant,  
Counterclaimant.

Case No. 4:20-cv-05640-YGR-TSH

**[PROPOSED] ORDER RE: DEFENDANT  
APPLE INC.'S ADMINISTRATIVE  
MOTION TO PARTIALLY SEAL  
DEPOSITION DESIGNATIONS**

Pursuant to Civil Local Rule 79-5, Defendant Apple Inc. has filed an Administrative Motion to Partially Seal Deposition Designations (the “Motion”). In support, Defendant Apple Inc. (“Apple”) filed the supporting declaration of Rachel S. Brass.

Having considered the Motion, all associated declarations, exhibits, and any argument of counsel, and for good cause appearing:

**IT IS HEREBY ORDERED** that the Motion is **GRANTED** to the extent noted below, and **DENIED** in all other respects. Accordingly,

The portions of the deposition designations noted below shall be admitted under seal:

Document or Portion of Document Sought to be Sealed	Evidence Offered in Support of Sealing	Ruling
Deposition of Eddy Cue, 109:4–110:17	Brass Decl. ¶¶ 6–8	
Deposition of Eddy Cue, 190:4–192:16	Brass Decl. ¶¶ 6–8	
Deposition of Joe Kreiner, 32:13–14		
Deposition of Joe Kreiner, 32:25–33:4		
Deposition of Joe Kreiner, 35:20–36:6		
Deposition of Joe Kreiner, 37:4–8, 37:14		
Deposition of Joe Kreiner, 39:11–13		
Deposition of Joe Kreiner, 40:2–41:9		
Deposition of Joe Kreiner, 41:21–42:8		
Deposition of Joe Kreiner, 42:21–23		

1	Deposition of Joe Kreiner, 47:20–		
2	48:3		
3	Deposition of Joe Kreiner, 48:20–		
4	49:13		
5	Deposition of Joe Kreiner, 51:12–		
6	52:19, 52:23–53:14		
7	Deposition of Joe Kreiner, 54:15–		
8	16		
9	Deposition of Joe Kreiner, 57:10–		
10	16		
11	Deposition of Joe Kreiner, 60:18–		
12	61:11		
13	Deposition of Joe Kreiner, 64:3–4,		
14	64:10–14		
15	Deposition of Joe Kreiner, 75:9–		
16	12, 75:15–76:8		
17	Deposition of Joe Kreiner, 77:6–		
18	78:6		
19	Deposition of Joe Kreiner, 80:1–2		
20	Deposition of Joe Kreiner, 80:9–		
21	12		
22	Deposition of Joe Kreiner, 81:6–		
23	83:22		
24	Deposition of Joe Kreiner, 85:13–		
25	86:21		
26	Deposition of Joe Kreiner, 87:6–		
27	21		
28	Deposition of Joe Kreiner, 88:14–		
	15, 88:25–89:1		
	Deposition of Joe Kreiner, 91:1–		
	19		
	Deposition of Joe Kreiner, 92:9–		
	93:1		

1	Deposition of Joe Kreiner, 93:7–		
2	22		
3	Deposition of Joe Kreiner, 94:23–		
4	95:20		
5	Deposition of Joe Kreiner, 96:7–		
6	11		
7	Deposition of Joe Kreiner, 96:22–		
8	97:1		
9	Deposition of Joe Kreiner, 97:13–		
10	98:4		
11	Deposition of Joe Kreiner,		
12	107:15–108:12		
13	Deposition of Joe Kreiner,		
14	114:15–115:8		
15	Deposition of Joe Kreiner,		
16	116:16–25		
17	Deposition of Joe Kreiner,		
18	130:11–12		
19	Deposition of Joe Kreiner,		
20	136:21–137:17		
21	Deposition of Joe Kreiner,		
22	137:24–138:3		
23	Deposition of Joe Kreiner, 138:7–		
24	10		
25	Deposition of Joe Kreiner,		
26	138:13–16		
27	Deposition of Joe Kreiner,		
28	140:15–19, 141:5–142:3		
	Deposition of Joe Kreiner, 168:7,		
	11–20		
	Deposition of Joe Kreiner,		
	191:20–23		

1	Deposition of Joe Kreiner, 215:7–		
2	23		
3	Deposition of Joe Kreiner, 229:7–		
4	17		
5	Deposition of Joe Kreiner,		
6	229:19–23		
7	Deposition of Joe Kreiner,		
8	260:17–18		
9	Deposition of Joe Kreiner, 267:4–		
10	25		
11	Deposition of Haseeb Malik,		
12	158:21–25		
13	Deposition of Haseeb Malik,		
14	181:10–20		
15	Deposition of Mark Rein, 101:8–		
16	20		
17	Deposition of Mark Rein, 102:14–		
18	20		
19	Deposition of Mark Rein, 105:2–		
20	14		
21	Deposition of Mark Rein, 107:6–7		
22	Deposition of Mark Rein, 108:2–		
23	109:1		

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2021

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The Honorable Yvonne Gonzalez Rogers  
United States District Judge